

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton
Executive Director
and Attorney-in-Chief*

*Southern District of New York
Jennifer L. Brown
Attorney-in-Charge*

May 19, 2022

BY ECF AND EMAIL

Honorable Paul A. Crotty
Southern District of New York
500 Pearl Street
New York, NY 10007

5/19/2022

The requests are denied.
SO ORDERED.

Paul A. Crotty

**Re: United States v. Richard Schneider,
20 Cr. 672 (PAC)**

Dear Judge Crotty:

I write to request two temporary modifications of Mr. Schneider's bail conditions:

First, I request that Mr. Schneider's curfew be extended on the evening of Wednesday, May 25, so that he may attend Philip Glass's *Akhmaten* at the Metropolitan Opera with a friend. Because the opera will run past Mr. Schneider's 10:00 p.m. curfew, I request that the Court permit and direct Pretrial Services to extend Mr. Schneider's curfew to 12:30 a.m. on that occasion.

Second, I request that Mr. Schneider be permitted to make a trip to visit his father in Ware, Massachusetts during the week of June 1-8, 2022. Mr. Schneider's father is 91 years old and in poor health, so each visit is essential.

The government defers to Pretrial Services regarding this request. Pretrial Services opposes the request because a drug test that Mr. Schneider took on May 17 was presumptively positive for methamphetamine, pending confirmation by a national lab. Even if confirmed, a positive test would be no reason to deny the present requests because Mr. Schneider remains compliant with treatment and has demonstrated during his long bail supervision that he poses no risk of flight or danger to the community. In his long struggle to achieve and maintain sobriety, Mr. Schneider had been consistently testing negative for more than two months prior to the present sample.

Respectfully submitted,

/s/ Clay H. Kaminsky
Clay H. Kaminsky
Assistant Federal Defender
(212) 417-8749 / (646) 842-2622

cc: AUSA Ashley Nicolas
USPSO Jonathan Lettieri